

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

THE PENN MUTUAL LIFE INSURANCE  
COMPANY,

Plaintiff,

V.

BARBARA GLASSER 2007 INSURANCE TRUST, CHRISTIANA BANK & TRUST COMPANY, as Trustee of the BARBARA GLASSER 2007 INSURANCE TRUST, and JARED L. BECKER

Defendants.

Misc. No.: 12-cv-01873-WJM-MF

(Case Pending in the District of  
Delaware, C.A. No. 09-677-RGA)

## STIPULATION

Plaintiff The Penn Mutual Life Insurance Company (“Penn Mutual”) and Non-Parties The GIII Accumulation Trust (“GIII”) and Ravi Dattatreya (collectively, “Subpoenaed Non-Parties”) hereby stipulate as follows:

1. Pursuant to the subpoenas served upon them, the Subpoenaed Non-Parties shall produce to Penn Mutual all documents that they produced to American General Life Insurance Company in *American General Life Ins. Co. v. Stanley Mann, et. al.*, C.A. No. 09-434-GMS (“*Mann*”).

2. The production shall exclude documents that explicitly refer to Stanley Mann and/or the Stanley Mann 2007 Insurance Trust. The production shall also exclude documents that were designated as privileged in *Mann*, provided that a privilege log is provided with the production.

3. The production shall be made on or before April 16, 2012.

4. Upon receipt of the productions, Penn Mutual shall withdraw with prejudice the subpoena issued to Robert Lesko, Esquire of Wilson Elser Moskowitz Edelman & Dicker LLP. Upon withdrawal of the subpoena, this proceeding will be dismissed with prejudice.

DRINKER BIDDLE & REATH LLP

PROSKAUER ROSE LLP

By: /s/ Katherine Villanueva  
Katherine Villanueva  
One Logan Square, Ste. 2000  
Philadelphia, PA 19103-6996  
(215) 988-2535

By: /s/ Matthew D. Batastini  
Matthew D. Batastini  
One Newark Center, 18th Floor  
Newark, NJ 07102-5211  
(973) 274-3200

*Attorney for Plaintiff The Penn Mutual Life Insurance Company*

Elise A. Yablonski  
Eleven Times Square  
New York, NY 10036-8299  
(212) 969-3000  
*Attorneys for Defendants Barbara Glasser 2007 Insurance Trust and Wilmington Savings Fund Society, FSB, as Trustee, and Nonparty The GIII Accumulation Trust*

GREENBERG DAUBER EPSTEIN & TUCKER

By: /s/ Edward Dauber  
Edward Dauber, Esq.  
Greenberg Dauber Epstein & Tucker  
One Gateway Center, Suite 600  
Newark, NJ 07102

*Attorney for Non-Party Ravi Dattatreya*

SO ORDERED: \_\_\_\_\_